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November 2, 2022

Hon. Pamela Chen
United States Courthouse
225 Cadman Plaza
Brooklyn, NY 10007

Re: United States v. Bush, et al.
19 Crim. 378 (PKC)

Dear Judge Chen:

We are the attorneys for the above-named defendant Yonette Repass (true name Davis), a defendant charged in the above indictment. I am writing to request a modification of Ms. Davis' curfew restrictions by having any restrictions eliminated.

As you may recall, Ms. Davis was removed from home detention and is currently being supervised by EDNY Pre-Trial Services. She has been under some form of supervision since her arrest in February 2020 and has been fully compliant with all conditions of supervision.

Ms. Davis is the single mother of a toddler and is solely financially responsible for herself and her son. While she works full time, she needs to work extra jobs to meet her financial obligations. Over the last year, we have requested allowances for extension of curfew, but there have been a number of last-minute offers to work that she has been unable to take advantage of because there was not sufficient time to seek permission from the Court for a modification of her curfew.

I have spoken at length about the elimination of any curfew with Brian Manganaro, a supervising officer at Pre-Trial Services. After consulting with SDNY Pre-trial Services (as you recall, Ms. Davis has a matter pending in SDNY as well) he has informed me that there is no objection from Pre-trial Services in either district to the elimination of curfew for Ms. Davis.

I am informed by Mr. Moscow, the AUSA assigned to this matter, that the government takes no position on this request.

Thank you for your attention to this matter.

Very truly yours,

/s/

ISABELLE A. KIRSHNER

cc: Shavoy Atkinson (By email)
Nicholas Moscow (By email)
Brian Mangaro (By email)